

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Northern District of New York

UNITED STATES OF AMERICA

v.

THOMAS ULLMAN,

Case No. 1:21-mj-315-CFH

Defendant.

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 6, 2021 in the county of Schenectady in the Northern District of New York
the defendant violated:

Code Section

18 U.S.C. § 2251

Offense Description

In that the defendant did employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct where he knew or had reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, where such visual depiction was produced or transmitted using materials that have been mailed shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, and where such visual depiction has actually been transported or transmitted using any means and facility of interstate or foreign commerce or in and affecting interstate or foreign commerce.

This criminal complaint is based on these facts:
See attached affidavit

☒ Continued on the attached sheet.
TFO 

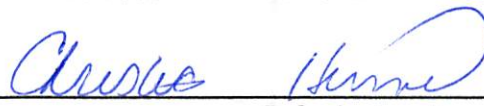
Complainant's signature

TFO Michelle Crandall, FBI

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

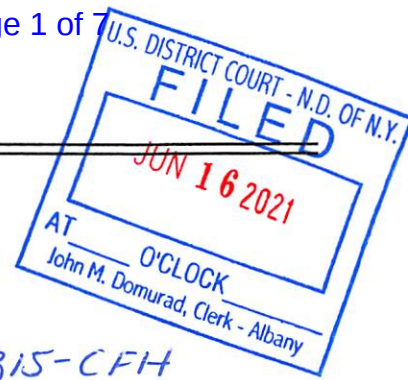
Date: June 16, 2021



Judge's signature

City and State: Albany, New York

Hon. Christian F. Hummel, U.S. Magistrate Judge



Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michelle C. Crandall, being duly sworn, depose and state:

INTRODUCTION

1. I am an investigator with the Rotterdam Police Department and Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI). I have been employed by the Rotterdam Police Department since July 2013 and a TFO with the FBI since November 2018. I am assigned to the Albany Division, Albany, NY. I have investigated a variety of violent crimes including child sexual exploitation, assault, burglary, and robbery. My current duties include investigating criminal violations relating to child exploitation and child pornography, including violations pertaining to the sexual exploitation of children, distribution, receipt and possession of child pornography in violation of 18 U.S.C. §§ 2251 and 2252A. I have received training in the area of child sexual exploitation and have observed and reviewed numerous examples of child pornography in all forms of media including computer media.

2. I make this affidavit in support of a criminal complaint charging Thomas Ullman ("ULLMAN"), with the sexual exploitation of a minor, in violation of Title 18, United States Code, Section 2251.

3. The statements contained in this affidavit are based on my involvement in this investigation, as well as information provided to me by other law enforcement officers involved in this investigation, and upon my training and experience. As this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that ULLMAN violated Title 18,

United States Code, Section 2251.

PROBABLE CAUSE

4. On March 12, 2021, I received information from Sheriff Ackerman of the McPherson County Sheriff's Department (MCSO) in Leola, South Dakota. Sheriff Ackerman stated that on February 8, 2021 the MCSO was contacted by a specific school district in a town in South Dakota. Representatives of the school district reported that it recovered inappropriate conversations, including videos and photos, on a school issued computer previously in the possession of Victim 1, a 15-year-old student whose date of birth is [REDACTED], 2005.

5. Sheriff Ackerman interviewed Victim 1. She stated that she met people online via a teen dating website where users can chat with one another and privately. Victim 1 used her school-issued computer to access the website and other platforms on the Internet. She met a man she knew to be "Tommy Ullman" on the teen dating website. Victim 1 shared videos with ULLMAN over Google Hangouts, which is a cross-platform messaging app developed by Google. She video chatted with ULLMAN and shared pictures and videos with him. ULLMAN told Victim 1 that his camera was broken, so she never saw ULLMAN. Victim 1 also communicated with ULLMAN via cellphone and saved his contact information under the name "Tomelia," to avoid anyone finding out she was communicating with ULLMAN.

6. On February 9, 2021, Deputy Muldoon and Sheriff Ackerman returned to the school to collect additional evidence. They met with representatives of the school who explained that the school had installed monitoring software on the school-provided laptops which is set to flag explicit content. On February 6, 2021, the software flagged explicit content on Victim 1's laptop and recorded screenshots of her communications with ULLMAN over Google Hangouts

that day.

7. Representatives of the school provided Sheriff Ackerman with a copy of a PDF file containing those screenshots, including still photos from a video chat in which ULLMAN directed Victim 1 to masturbate her vagina with her fingers and a hair brush. There is a screenshot of the video of Victim 1 masturbating and the focal point of the video is her vagina. The still photos from the video also depict the chats between Victim 1 and ULLMAN on the left side with ULLMAN's name displayed. During the conversation, ULLMAN instructed Victim 1, "show me your pussy" and directed her to masturbate using "two fingers" and her hair brush, which he directed her to insert in her vagina and "angle. . . towards ur tummy."

8. On February 22, 2021, Detective Almeida of the South Dakota Internet Crimes Against Children searched Victim 1's cellphone pursuant to her mother's consent and took photographs of that manual search. Det. Alemedia photographed text messages between ULLMAN and Victim 1 from February 1, 2021 in which Victim 1 asked ULLMAN, "I forget how old r u again" and ULLMAN replies, "18 and u." Victim 1, replies "15". The conversation took place approximately 5 days before the above-described video chat in which ULLMAN directed Victim 1 to masturbate. The phone number listed under "Tomelia" in Victim 1's contacts is 518-XXX-6888.

9. Through subpoena results, investigators established that the 518-XXX-6888 telephone number saved in Victim 1's phone is a Verizon number and the contact name on the account is "Thomas Ullman." Investigators also sent an administrative subpoena to Google for information related to the Google account Ullman used during the Google Hangouts chats with Victim 1. The results of the subpoena showed that the Google Account is registered under the

name “Tommy Ullman.” The recovery SMS number listed was also 518-XXX-6888. Google also provided the IP addresses through which the Google Account was accessed from January 31, 2021 through February 6, 2021—the dates during which the conversations with Victim 1 outlined above occurred. Subpoena results from Verizon indicated that telephone number 518-XXX-6888 was assigned to the IP addresses that Google provided during that timeframe, establishing that the user of the 518-XXX-6888 cellphone was using the Google Account during the explicit conversation with Victim 1.

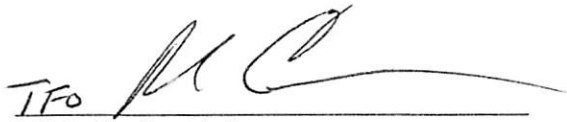
10. I ran ULLMAN’s information through a law enforcement database and found an address in Schenectady, referred to as the SUBJECT PREMISES. I then conducted a check with the United States Postal Service and confirmed that ULLMAN receives mail at the SUBJECT PREMISES in Schenectady. Members of the FBI Child Exploitation and Human Trafficking Task Force (“the Task Force”) conducted surveillance of the SUBJECT PREMISES and observed a man matching ULLMAN’s description exiting the SUBJECT PREMISES.

11. On June 16, 2021, members of the FBI Child Exploitation and Human Trafficking Task Force executed a search warrant at the SUBJECT PREMISES. ULLMAN exited the SUBJECT PREMISES before execution of the warrant and agreed to speak with members of the Task Force. ULLMAN voluntarily accompanied members of the Task Force to the FBI Office in Albany. FBI SA Zubik and I drove ULLMAN to the FBI Office. During the ride, he was not handcuffed, he was advised multiple times that he was not under arrest and was free to leave, and he got out of the car and went into a convenience store by himself. While at the FBI Office, ULLMAN admitted that he has used the teen dating site to talk with over 200 teenagers, he is specifically attracted to girls around the age of 15, he is currently communicating with five


teenagers, he communicated with Victim 1, and he instructs girls to masturbate and send him videos and pictures.

CONCLUSION

12. Based upon the above information, there is probable cause to believe that ULLMAN violated Title 18, United States Code, Section 2251 in that ULLMAN did employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct where ULLMAN knew or had reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, where such visual depiction was produced or transmitted using materials that have been mailed shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, and where such visual depiction has actually been transported or transmitted using any means and facility of interstate or foreign commerce or in and affecting interstate or foreign commerce.


TFO
Michelle Crandall
Task Force Officer
Federal Bureau of Investigation

Attested to by the Applicant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure, June 16, 2021


Hon. Christian F. Hummel
U.S. Magistrate Judge